

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MIED-AMERICA CARPENTERS)	
REGIONAL COUNCIL,)	
)	
Plaintiff,)	
)	Case No. 4:22-cv-00291 SEP
vs.)	
)	
ALBERT BOND, INTERERRAIL)	
OUTDOOR, LLC and FOXPOINT)	
INTERACTIVE, LLC,)	
)	
Defendants.)	

**DEFENDANT ALBERT BOND'S SECOND MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT**

COMES NOW Defendant Albert Bond, by and through counsel, by leave of Court first granted after Order this date for a demand to show good cause prior to a first extension, respectfully requests an extension of time, up to and including May 4, 2022

1. Plaintiff filed their Complaint on March 10, 2022.
2. Defendant Albert Bond was served on March 12, 2022.
3. As a result, Defendant's deadline to file responsive pleadings to Plaintiff's Complaint is currently April 4, 2022.
4. Due to agreement between the Parties, additional time to analyze and prepare responses is required. Defendant therefore respectfully requests a thirty (30) day extension of its deadline to file responsive pleading to Plaintiff's Complaint, up to and including May 4, 2022.
5. This is a complex case involving several areas of additional expertise on various matters pertaining to the Complaint, including, but not limited to, recent Department of Justice

issues that as a matter-of-fact affect additional considerations as to the preparation of the pleadings going forward on this case.

6. Only within the last few days it has been necessary for Defendant, through counsel, to contact and review several defense and other firms to enter as co-counsel in and relation to this action, in response to the filing of appropriate pleadings and designations before this court within diverse areas of expertise on Defendant Bond's behalf.

7. Defendant's counsel contacted Plaintiff's counsel regarding this request. Plaintiff's counsel does not oppose and consents to this request.

8. No party will be prejudiced by the requested extension of time, nor is this request made for purposes of delay.

WHEREFORE, for good cause shown, Defendant respectfully requests that this Court grant it up to and including May 4, 2022, to file responsive pleadings to Plaintiff's Complaint and for any further relief the Court deems just and proper.

Respectfully submitted,

GOFFSTEIN LAW, LLC

/s/John H. Goffstein

John H. Goffstein, #MO19143

225 S. Meramec Avenue, Suite 402

Clayton, Missouri 63105

314.932-1919 – Office

314.932.5048 – Facsimile

john@goffsteinlaw.com

Attorney for Defendant Bond

CERTIFICATE OF SERVICE

I hereby certified that on April 1, 2022, the foregoing was filed electronically with the clerk of Court and served via the Court's CM/ECF system to all attorneys of record.

/s/John H. Goffstein